

# EXHIBIT A

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

This Document Relates to:

ALL ACTIONS

**DECLARATION OF DANIEL KOLTA IN  
SUPPORT OF DEFENDANTS' JUNE 11,  
2025 PRIVILEGE DISPUTE BRIEF  
PURSUANT TO SPECIAL MASTER  
ORDER NO. 4, § II (MAY 19, 2025  
PRIVILEGE LOG CHALLENGES)**

**DECLARATION OF DANIEL KOLTA**

I, Daniel Kolta having personal knowledge of the following state:

1. I am the Legal Director, Global Safety, at Uber. I was first employed by Uber in July 2018 and have worked as in-house legal counsel for the past 7 years. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this

1 Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier,  
2 LLC, and Rasier-CA, LLC's June 11, 2025 Brief Pursuant to Special Master Order No. 4 § II (ECF  
3 2933). The facts set forth herein are true and correct and are based on my own personal knowledge,  
4 and I could and would competently testify thereto if called.

5  
6 2. I am familiar with the document logged as JCCP\_MDL\_PRIVLOG097150. It is a  
7 Google Slide deck presentation regarding recommendations for addressing riders banned for low  
8 ratings. The date on the metadata is December 18, 2024, and the document is marked "Attorney Work  
9 Product Prepared at the Direction of Counsel." Because the issue of banning riders implicates legal  
10 risk, including risks relating to discrimination lawsuits, I was involved in assessing the company's  
11 policies in this area. I directed the research and analysis contained in JCCP\_MDL\_PRIVLOG097150  
12 and requested the preparation of this slide deck. The recommendations in the document reflect legal  
13 advice that I provided.

14  
15 I declare under penalty of perjury under the laws of the United States of America that the foregoing is  
16 true and correct.

17 Executed on June 10, 2025.

18 By:   
19 Daniel Kolta  
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